

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KRISTY BRYANT YULE, as)
Temporary Administrator of the Estate)
of **MICHAEL BRYANT, JOHN**)
DRAKE, BECKY KELLEY, AND)
HERB LOWE,)

Plaintiffs,)

v.)

VERNON JONES, MARILYN BOYD)
DREW, MORRIS WILLIAMS, AND)
RICHARD STOGNER, in their)
individual capacities, and DEKALB)
COUNTY,)

Defendants.)

**CIVIL ACTION NO.
1:04-CV-2462-WSD**

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES

Plaintiffs Kristy Bryant Yule, as Temporary Administrator for the Estate of Michael Bryant ("Bryant"), John Drake ("Drake"), Becky Kelley ("Kelley") and Herb Lowe ("Lowe") (collectively "Plaintiffs") seek to recover their attorneys' fees and expenses incurred in this matter.

Pursuant to F.R.C.P. 54(d)(2) and L.R. 54.2(A)(2), this motion for fees need only specify the judgment and the statute or other grounds on the basis of which

entitlement to the award is claimed and the approximate amount of the fees and expenses sought. See L.R. 54.2(A)(2).

Plaintiffs accordingly specify that (a) the Court entered judgment in favor of Plaintiffs Yule and Drake on April 2, 2010; (b) Plaintiffs' Motion for Sanctions was pending at the time of judgment and is reincorporated herein; (c) the Court is empowered to award attorneys' fees and expenses pursuant to its inherent powers and pursuant to 42 U.S.C. § 1988(b); and (d) Plaintiffs estimate in good faith that they are entitled to approximately \$2.02 million in attorneys' fees and expenses incurred in prosecuting the matter, plus any multiplier the Court may determine is warranted. Plaintiffs will file "a detailed specification and itemization of the requested award, with appropriate affidavits and other supporting documentation" within 30 days after filing this motion. See L.R. 54.2(A)(2).

For these reasons, and the reasons set forth more fully in Plaintiffs' Brief in Support of Their Motion for Attorneys' Fees and Expenses, Plaintiffs should be entitled to recover all of their fees and expenses incurred in this matter.

[signature on following page]

Respectfully submitted this 15^h day of April 2010.

s/ Christopher S. Anulewicz

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CERTIFICATE OF COUNSEL REGARDING FONT SIZE

Counsel certifies that the foregoing has been prepared using Times New Roman font size 14 in accordance with Local Rules 5.1(B)(3) and 7.1(D).

This 15th day of April, 2010.

s/Christopher S. Anulewicz
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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2010, I sent by electronic mail the foregoing to the following attorneys of record:

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